

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

: No. 2:12 CR 164
JUDGE MARBLEY

TODD L. SMITH

GOVERNMENT'S PLEA AGREEMENT SUBMISSION
OF ELEMENTS AND PENALTIES FOR
18 U.S.C. §2422(b)

Count 1

1. ELEMENTS: 18 U.S.C. §2422(b)

First: That the defendant did knowingly, use a means or facility of interstate commerce, a cellular phone and the Internet, to persuade, induce, or entice minors who have not attained the age of 18, to engage in sexual activity;

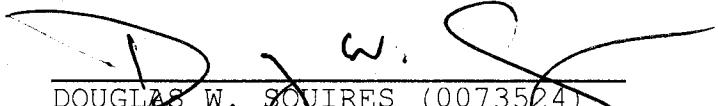
Second: That such acts occurred in whole or in part at or about the time alleged in the Information in the Southern District of Ohio.

2. PENALTIES:

- A. Mandatory Minimum: 10 years imprisonment
- B. Possible Maximum: Life in prison, a fine of \$250,000, 5 years to life supervised release, and \$100 special assessment.

Respectfully submitted,

CARTER M. STEWART
United States Attorney


DOUGLAS W. SQUIRES (0073524)
Assistant United States Attorney
303 Marconi Boulevard
Suite 200
Columbus, Ohio 43215
(614) 469-5715
Fax: (614) 469-5653
Douglas.Squires@usdoj.gov